

1 GABROY LAW OFFICES  
2 Christian Gabroy (#8805)  
3 Justin A. Shiroff (#12869)  
4 The District at Green Valley Ranch  
5 170 South Green Valley Parkway, Suite 280  
6 Henderson, Nevada 89012  
7 Tel (702) 259-7777  
8 Fax (702) 259-7704  
9 christian@gabroy.com  
10 jshiroff@gabroy.com  
11 *Attorneys for Plaintiff Russell LeBarron*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 RUSSELL LEBARRON, an individual;

15 Case No: 2:19-cv-01739-JCM-DJA

16 Plaintiff,

17 vs.

18 INTERSTATE GROUP, LLC; DOES I  
19 through X; and ROE Corporations XI  
20 through XX, inclusive,

21 Defendant.

22 **STIPULATION AND ORDER TO  
23 EXTEND TIME TO RESPOND TO  
24 COUNTERCLAIM (ECF NO. 9)**  
25 **(SECOND REQUEST)**

26 **STIPULATION AND ORDER TO EXTEND TIME  
27 TO RESPOND TO COUNTERCLAIM (ECF NO. 9)**

28 IT IS HEREBY STIPULATED AND AGREED between counsel for  
Plaintiff/Counter-Defendant Russell LeBarron ("Plaintiff") and Defendant/Counterclaimant  
Interstate Group, LLC ("Defendant") as follows:

29 **WHEREAS**, on or about August 9, 2019, Plaintiff filed in the Eighth Judicial  
30 District Court a Complaint (the "Complaint"), which was assigned Case No. A-19-  
31 799959-C (the "Lawsuit");

32 **WHEREAS**, on or about September 10, 2019, Plaintiff served the  
33 Defendant with the Complaint;

34 **WHEREAS**, Defendant filed a Notice of Removal with the United States  
35 District Court, District of Nevada (ECF No. 1);

36 **WHEREAS**, Defendant filed its Answer and Counterclaim (the  
37 "Counterclaim", ECF No. 9) on or about October 14, 2019;

**WHEREAS**, Parties stipulated to an extension of time to respond to Defendant's counterclaim (ECF No. 11).

**WHEREAS**, an Order was granted on October 30, 2019 (ECF No. 12) scheduling Plaintiff's responsive pleading to be filed on or before November 15, 2019.

**WHEREAS**, in an effort to conserve costs and time, the Parties plan on engaging in early settlement negotiations and have an Early Neutral Evaluation scheduled for December 4, 2019 (ECF No. 7).

**WHEREAS**, the Parties agree to an additional twenty-six (26) day extension through December 11, 2019, for Plaintiff to respond to the Counterclaim in the event this matter does not resolve at the ENE; and,

**WHEREAS**, this is the second request for an extension regarding the filing of Plaintiff's response to Defendant's Counterclaim, which is made in good faith, not for purposes of delay, to conserve costs and fees that are better put towards settlement at the ENE, and neither party is prejudiced by this extension.

Dated this 12th day of November 2019.

Dated: November 12, 2019

Dated: November 12, 2019

Respectfully submitted,

Respectfully submitted,

By /s/ Christian Gabroy, Esq.

Christian Gabroy, Esq.

Justin A. Shiroff, Esq.  
The Shiroff Law Firm, P.C.

## The District at Green Valley Ranch 170 South Green Valley Parkway

170 South Green Valley Parkway,  
Suite 380

Suite 280  
Honolulu

Henderson, Nevada 89012  
Fax (702) 359-7704

Fax (702) 259-7704

*Attorneys for Plaintiff*

By /s/ Malani L. Kotchka, Esq.

Malani L. Kotchka

Hejmanowski & McCrea LLC

520 South Fourth Street, Suite 320  
Las Vegas, NV 89101

Las Vegas, NV 89101  
Telephone: (702) 824-

Telephone: (702) 834-8777

*Attorneys for Defendant*

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

Dated: November 14, 2019